



Control Number: 49737



Item Number: 64

Addendum StartPage: 0

**SOAH DOCKET NO. 473-19-6862
PUC DOCKET NO. 49737**

**APPLICATION OF SOUTHWESTERN
ELECTRIC POWER COMPANY FOR
CERTIFICATE OF CONVENIENCE
AND NECESSITY AUTHORIZATION
AND RELATED RELIEF FOR THE
ACQUISITION OF WIND
GENERATION FACILITIES**

§
§
§
§
§
§
§

**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

RECEIVED
2019 AUG 29 PM 2:32
PUBLIC SERVICE COMMISSION
FILING CLERK

SOUTHWESTERN ELECTRIC POWER COMPANY'S LIST OF ISSUES

Southwestern Electric Power Company (SWEPCO) proposes the following list of issues to be addressed in this proceeding, as required by the Commission's August 22, 2019 Order of Referral.

I. ISSUES TO BE ADDRESSED

CCN Requirements

1. Is the certificate amendment to include the Selected Wind Facilities necessary for the service, accommodation, convenience, or safety of the public, considering the following factors?
 - a. the adequacy of existing service;
 - b. the need for additional service;
 - c. the effect of granting the certificate on the recipient of the certificate and any electric utility serving the proximate area; and
 - d. other factors, such as:
 - i. community values;
 - ii. recreational and park areas;
 - iii. historical and aesthetic values;
 - iv. environmental integrity;
 - v. the probably improvement of service or lowering of cost to consumers in the area if the certificate is granted; and

- vi. to the extent applicable, the effect of granting the certificate on the ability of this state to meet the goal established by PURA § 39.904(a).
- 2. Should the Commission grant the alternative approvals requested in SWEPCO's application in the event that not all SWEPCO and Public Service Company of Oklahoma jurisdictions approve acquisition of the Selected Wind Facilities?

Sale, Transfer, Merger Issues

- 3. Does SWEPCO's proposal to acquire an interest in the Selected Wind Facilities outside the State of Texas constitute a transaction to "sell, acquire, or lease plant as an operating unit or system in this state for a total consideration of more than \$10 million" pursuant to PURA § 14.101(a)?
- 4. If PURA § 14.101(a) does apply, is it in the public interest for SWEPCO to acquire an interest in the Selected Wind Facilities under PURA § 14.101, considering the following factors:
 - a. What is the reasonable value of the property, facilities, or securities to be acquired, disposed of, merged, transferred or consolidated?
 - b. Will the transaction have an adverse effect on the health or safety of customers or employees?
 - c. Will the transaction result in the transfer of jobs of citizens of this state to workers domiciled outside of Texas?
 - d. Will the transaction result in a decline in service?


Rate Treatment Issues

- 5. Is it reasonable to include any unrealized production tax credits (PTCs) in a deferred tax asset to be included in rate base in the event the PTCs cannot be fully utilized in a given year(s)?

Respectfully submitted,

Rhonda Colbert Ryan
American Electric Power Service Corporation
400 West 15th Street, Suite 1520
Austin, Texas 78701
Telephone: (512) 481-3321
Facsimile: (512) 481-4591
rcryan@aep.com

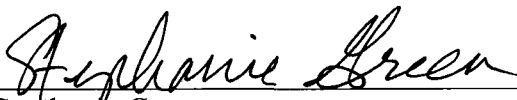
William Coe
Kerry McGrath
Stephanie Green
Duggins, Wren, Mann & Romero, LLP
600 Congress Ave., Suite 1900
William Coe
wcoc@dwmrlaw.com
State Bar No.00790477
Kerry McGrath
kmcgrath@dwmrlaw.com
State Bar No.13652200
Stephanie Green
sgreen@dwmrlaw.com
State Bar No. 24089784

By: 
Stephanie Green

**ATTORNEYS FOR SOUTHWESTERN
ELECTRIC POWER COMPANY**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this motion was served on all parties of record this 29th day of August, 2019.


Stephanie Green